

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Montage Mortgage, LLC

Plaintiff,

vs.

Case No.: 3:17-cv-02971-S

Pacific Union Financial, LLC, John Perry,
Valerie Coleman, Caitlin V. Cooke, Eduardo
Creque, Jessica M. Furr (Keen), Kathy Keller,
Fouad Naghmi, Tammy Neal, Charles F. Peer,
Michaelene Whyte, and Melissa Willoby,

Defendants.

REQUEST FOR ENTRY OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 68(a), Plaintiff Montage Mortgage, LLC (“Montage”) hereby requests that Judgment be entered for it against Defendant Pacific Union Financial, LLC (“Pacific Union”) in the amount of \$400,000.

On August 17, 2018, Defendant Pacific Union served Plaintiff Montage with an Offer of Judgment under Federal Rule of Civil Procedure 68. The Offer is attached hereto as Exhibit A.

On August 29, 2018, Plaintiff Montage served Defendant Pacific Union a Notice of Acceptance of the Offer, which is attached hereto as Exhibit B.

Proof of service of the Offer and Acceptance are enclosed within Exhibit A and B.

WHEREFORE, Plaintiff Montage requests that Judgment be entered against Defendant Pacific Union in the amount of \$400,000.

Dated: August 30, 2018

Respectfully submitted,

/s/ Jeffrey P. Blackwood
Jason W. McElroy

State Bar No. 24108416
Jeffrey P. Blackwood*
D.C. Bar No. 1027658
McElroy@thewbkfirm.com
Blackwood@thewbkfirm.com
Weiner Brodsky Kider PC
1300 19th Street NW 5th Floor
Washington DC 20036
Office: (202)628-2000
Facsimile: (202)628-2011

* Admitted *Pro Hac Vice*

**ATTORNEYS FOR PLAINTIFF
MONTAGE MORTGAGE, LLC**

CERTIFICATE OF SERVICE

I certify that on August 30, 2018, I caused a copy of the foregoing REQUEST FOR ENTRY OF JUDGMENT be served via electronic mail and First Class Mail upon the following parties and counsel of record:

Ann Marie Painter
Jason R. Elliott
Hayden M. Schottlaender
Perkins Coie LLP
500 N. Akard St., Suite 3300
Dallas, Texas 75201
214-965-7723
214-965-7799 (fax)
ampainter@perkinscoie.com
jelliott@perkinscoie.com
hschottlaender@perkinscoie.com

Barak Cohen
Perkins Coie LLP
700 13th St NW, Suite 600
Washington, DC 20005-3960
202-654-6200
202-654-6211 (fax)
bcohen@perkinscoie.com

***Counsel for Defendant Pacific Union
Financial, LLC***

Tyree Preston Jones, Jr
Manasi Venkatesh
Reed Smith LLP
1301 K Street NW
Suite 1100
Washington, DC 20005
202-414-9296
202-414-9299 (fax)
tpjones@reedsmith.com
mvenkatesh@reedsmith.com

Stephan D Selinidis
Reed Smith LLP
811 Main
Suite 1700
Houston, TX 77002
713-469-3815
713-469-3899 (fax)
sselinidis@reedsmith.com

***Counsel for Defendants Catlin Cooke,
Charles F. Peer, Eduardo Creque, Fouad
Naghmi, Jessica M. Furr (Keen), Kathy
Keller, Melissa Willoby, Michaelene, Whyte,
Neal Tammy, Valeria Coleman***

/s/ Jeffrey Blackwood
Jeffrey P. Blackwood